

Message

From: Tucker, Marlene [Tucker.Marlene@epa.gov]
Sent: 7/17/2019 7:57:49 PM
To: Bolden-Wright, Harlotte [hbolden-wright@adem.alabama.gov]
CC: Carr, Doug [DKC@adem.alabama.gov]; Kler, Denis [Kler.Denis@epa.gov]
Subject: RE: William MBGP-NSPS OOOa Notification

Harlotte,

Thanks for the information. The attached letter dated December 19, 2016 from Williams, appears to support that Williams did comply with the OOOOa initial startup notification for construction, reconstruction or modification within the requisite 15 days, as required by §60.5420a and 40 CFR 60.70(a)(3). I appreciate your input. I will take another look at that claim as alleged and will verify.

Regards

Marlene Tucker

From: Bolden-Wright, Harlotte <hbolden-wright@adem.alabama.gov>
Sent: Wednesday, July 17, 2019 3:52 PM
To: Tucker, Marlene <Tucker.Marlene@epa.gov>; Kler, Denis <Kler.Denis@epa.gov>
Cc: Carr, Doug <DKC@adem.alabama.gov>
Subject: RE: William MBGP-NSPS OOOa Notification

Marlene,

Sorry I didn't complete my previous email before it was sent. §60.5420a of NSPS OOOOa requires the submittal of notifications required under §60.7(a)(1),(3) and (4) for an onshore natural gas processing plant.

§60.7 Notification and record keeping.

(a) Any owner or operator subject to the provisions of this part shall furnish the Administrator written notification or, if acceptable to both the Administrator and the owner or operator of a source, electronic notification, as follows:

(1) A notification of the date construction (or reconstruction as defined under §60.15) of an affected facility is commenced postmarked no later than 30 days after such date. This requirement shall not apply in the case of mass-produced facilities which are purchased in completed form.

(2) [Reserved]

(3) A notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.

Please let me know if this is not considered their notification. Thanks.

From: Bolden-Wright, Harlotte
Sent: Wednesday, July 17, 2019 2:39 PM
To: Tucker, Marlene <Tucker.Marlene@epa.gov>; Kler, Denis <Kler.Denis@epa.gov>
Cc: Carr, Doug <DKC@adem.alabama.gov>
Subject: William MBGP-NSPS OOOa Notification

Marlene,

If I heard you correctly you mentioned that you would add to the list of violations for the plant the failure to submit notification for NSPS OOOOa. I have attached a document that the facility submitted to the Department and copied EPA Region 4 on stating that it was submitting the letter to demonstrate compliance with the notification requirements specified in §60.7(a)(3).

Harlotte Bolden-Wright

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